

EXHIBIT A

July 22, 2022

Casa Express Corp previously applied for a specific license (VENEZUELA-EO13850-2021-874564-1) with OFAC seeking authorization to execute certain blocked real properties that are being held by Raul Gorri Belisario (through shell entities) in partial satisfaction of a judgment that it obtained against the Bolivarian Republic of Venezuela. On July 18, 2022, OFAC denied the application reasoning that it lacks authority to authorize the execution of these properties when “they appear to belong to another person other than [Venezuela].” We agree.

In its original application, Casa Express explained its legal theory to OFAC. In a nutshell, Casa Express believes that the blocked properties are subject to a constructive trust in Venezuela because they were purchased with misappropriated Venezuelan funds. But whether a constructive trust should be imposed is a question of law that must be determined by the judiciary. And until a Court makes that determination, the shell entities are the owners of, and hold title to, the blocked properties.

Casa Express understands that OFAC cannot issue a specific license to Casa Express authorizing it to execute the blocked properties as long as they appear to belong to another person other than Venezuela. For this reason, Casa Express submits this revised application for the limited purpose of obtaining a specific license that would authorize it to litigate its post-judgment collection theory in the case styled *Casa Express Corp v. Bolivarian Republic of Venezuela, et al.* Case No. 1:21-23103-BB, which is pending in the Southern District of Florida.

To be clear, this revised application does not seek authorization to **execute** the blocked properties. It merely seeks authorization to **litigate**. If Casa Express prevails in Court, it will submit a new application for a specific license seeking authorization to execute the blocked properties. Because, at that point, the properties will no longer appear to belong to a third person other than Venezuela.

Casa Express requests expedited review of this application. The shell entities have moved to dismiss the case arguing that any “judicial process” is “null and void” without a specific license. Casa Express’s reply brief is due on August 1.

Casa Express deserves its day in Court. And Venezuela has expressly authorized Casa Express to seek these claims on its behalf.

I look forward to hearing back from the Department.

Sincerely,

GAMARDO, P.A.



Andres Gamardo, Esq.
Counsel to Casa Express Corp